BAOTRIS PRIVACY POLICY

***Last Revised on January 15, 2020***

This Privacy Policy for Baotris (“**Baotris**”, “**we**”, “**us**” “**our**”) describes how we collect, use and disclose information about visitors to the Baotris website (www.baotris.com), as well as developers or other users downloading or otherwise using the Baotris application and related services (collectively, the website and Baotris application are referred to as the “**Services**”). For the purposes of this Privacy Policy, “**you**” and “**your**” means you as the user of the Services.

PLEASE READ THIS PRIVACY POLICY CAREFULLY. BY USING, ACCESSING, OR DOWNLOADING ANY OF THE SERVICES, YOU AGREE TO THE USE OF YOUR INFORMATION IT DESCRIBES AND TO THE OTHER TERMS OF THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, PLEASE DO NOT ACCESS AND USE THE SERVICES.

# UPDATING THIS PRIVACY POLICY

We may modify this Privacy Policy from time to time in which case we will update the “Last Revised” date at the top of this Privacy Policy. If we make changes that are material, we will use reasonable efforts to attempt to provide notice to you and, where required by applicable law, we will obtain your consent. If you have provided an email address, you may be notified by email at the last email address you provided us, by posting notice of such changes on the Services, or by other means, consistent with applicable law. However, it is your sole responsibility to review the Privacy Policy from time to time to view any such changes. The updated Privacy Policy will be effective as of the time of posting, or such later date as may be specified in the updated Privacy Policy. **If you do not accept and agree to this Privacy Policy, including any changes, then you must not access or use the Services.**

# Information we collect

In order to provide you with particular services, we may ask you to provide us with certain details or information about you. We may also automatically collect information through the use of cookies and other tracking technologies. Information that we collect through the Service includes:

* **Basic identifiers**, such as:
	+ Registration details, which are required to download and use our software development kit (“SDK”). These details may include your name, company name and email address.
	+ Information you submit through inquiries or messages to us, including your name, email or phone number, and any other information you choose to include.
	+ Payment or financial information, as necessary.
	+ Your IP address and session ID.
	+ Information about the device you use to access the Services.
* **Internet and network activity**, such as
	+ Certain analytic data related to your use of the Services, such as the amount of time you spend interacting with the Services and clickstream data.

# How we use your information

We may use the above categories of information for a number of purposes, including:

* Providing you with the Services and any related features or functions.
* Providing you with a tailored and user-friendly experience as you navigate our website and other Services.
* Promoting the Services and providing any campaigns or promotions.
* Communicating with you.
* Assessing the performance and effectiveness of the Services and any related features or content.
* Compiling statistical and analytic information.
* Complying with any applicable legal obligations.
* Enforcing any applicable terms.
* Protecting and ensuring the safety and security of our Services and users.

# HOW we SHARE YOUR INFORMATION

We may share the above categories of information with third parties in certain circumstances or for certain purposes, including:

* *For business purposes.* We may share your information with vendors and other service providers, including our data hosting and data storage partners (such as Snowflake and Amazon Web Services), analytics providers, payment processors, and any data security vendors. We may also share information with professional advisors, such as auditors, law firms, or accounting firms.
* *With your direction or consent.* We may share your information with third parties if you request or direct us to do so. This includes your use of social media widgets or certain login integrations.
* *Compliance with law.* We may share your information to comply with applicable law or any obligations thereunder, including cooperation with law enforcement, judicial orders, and regulatory inquiries.
* *In the context of a transaction.* We may share your information connection with an asset sale, merger, bankruptcy, or other business transaction.
* *For other business reasons.* We may also share your information to enforce any applicable terms of service, and to ensure the safety and security of the Services and/or our users.

Baotris does not sell your information. You acknowledge that such sharing of information may occur in all of the aforementioned circumstances and is permitted by and subject to this Privacy Policy.

# COOKIES AND OTHER TRACKING TECHNOLOGIES

*Do Not Track Signals*

Your browser settings may also allow you to transmit a “Do Not Track” signal when you visit various websites. Our Services are not configured to respond to “Do Not Track” signals received from browsers. To learn more about “Do Not Track” signals, you can visit <http://www.allaboutdnt.com/.>

*Cookies and Other Tracking Technologies*

You may control the way in which your devices permit the use of Tracking Technologies. If you so choose, you may block or delete our cookies from your browser; however, blocking or deleting cookies may cause some of the Services, including any portal features and general functionality, to work incorrectly.

Most browsers accept cookies automatically. However, you may be able to configure your browser settings to use the Services without some cookie functionality. You can delete cookies manually or set your browser to automatically delete cookies on a pre-determined schedule. For example, in the Internet Explorer menu bar, select: Tools 🡪Internet Options🡪Browsing History🡪Delete to view manual and automatic options.

The Services also use certain analytic services, including Google Analytics. To opt out of tracking by Google Analytics, click [here](https://tools.google.com/dlpage/gaoptout).

We may also use Flash cookies (also known as “persistent identification elements” or “local shared objects”) on certain pages. Because Flash cookies cannot be controlled through your browser settings, you may click [here](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html) to adjust your preferences. You can also identify Flash cookies running on your computer by visiting the Flash Player folder. Flash cookies, or LSO files, are typically stored with a “.SOL” extension. Please note that if you block cookies, some functions otherwise available on the Services may be unavailable, and we may not be able to present you with personally-tailored content.

If you have questions regarding the specific information about you that we process or retain, as well as your choices regarding our collection and use practices, please contact us using the information listed below.

# SOCIAL FEATURES

# Certain features of the Services permit you to initiate interactions between the Services and third-party services or platforms, such as social networks (“Social Features”). Social Features include features that allow you to click and access Baotris’ pages on certain third-party platforms, such as Facebook and Twitter, and from there to “like” or “share” our content on those platforms. Use of Social Features may entail a third party’s collection and/or use of your data. If you use Social Features or similar third-party services, information you post or otherwise make accessible may be publicly displayed by the third-party service you are using. Both Baotris and the third party may have access to information about you and your use of both the Services and the third-party service.

# Third party websites and links

Our Services may contain links to other online platforms operated by third parties. We do not control such other online platforms and are not responsible for their content, their privacy policies, or their use of your information. Information you provide on public or semi-public venues, including information you share on third-party social networking platforms (such as Facebook or Twitter) may also be viewable by other users of the Services and/or users of those third-party online platforms without limitation as to its use by us or by a third party. Our inclusion of such links does not, by itself, imply any endorsement of the content on such platforms or of their owners or operators except as disclosed on the Services. We expressly disclaim any and all liability for the actions of third parties, including but without limitation to actions relating to the use and/or disclosure of personal information by third parties. Any information submitted by you directly to these third parties is subject to that third party’s privacy policy.

# CHILDREN’S PRIVACY

We do not seek or knowingly collect any personal information about children under 18 years of age through the website or about those who download the Baotris application. If we become aware that we have unknowingly collected information about a child under 18 years of age, we will make commercially reasonable efforts to delete such information from our database.

If you are the parent or guardian of a child under 18 years of age who has provided us with their personal information, you may contact us using the below information to request that it be deleted.

# DATA SECURITY

Please note that any information you send to us electronically, while using the Services or otherwise interacting with us, may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential information to us. Please be aware though that, despite our best efforts, no security measures are perfect or impenetrable, and we cannot guarantee “perfect security.” Any information you send us through any means is transmitted at your own risk.

# YOUR CALIFORNIA PRIVACY RIGHTS

The California Consumer Privacy Act (“CCPA”) provides California residents with the additional rights listed here. To exercise these rights, see the “Exercising Your California Privacy Rights” subsection below.

* Right to Know

You have the right to know and see what information we have collected about you over the past 12 months, including:

* + The categories of information we have collected about you;
	+ The categories of sources from which the information is collected;
	+ The business or commercial purpose for collecting your information;
	+ The categories of third parties with whom we have shared your information; and
	+ The specific pieces of information we have collected about you.
* Right to Delete

You have the right to request that we delete the information we have collected from you (and direct our service providers to do the same). There are a number of exceptions, however, that include, but are not limited to, when the information is necessary for us or a third party to do any of the following:

* + Complete your transaction;
	+ Provide you a good or service;
	+ Perform a contract between us and you;
	+ Protect your security and prosecute those responsible for breaching it;
	+ Fix our system in the case of a bug;
	+ Protect the free speech rights of you or other users;
	+ Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et seq.);
	+ Engage in public or peer-reviewed scientific, historical, or statistical research in the public interests that adheres to all other applicable ethics and privacy laws;
	+ Comply with a legal obligation; or
	+ Make other internal and lawful uses of the information that are compatible with the context in which you provided it.
* Other Rights

You can request certain information about our disclosure of your information to third parties for their own direct marketing purposes during the preceding calendar year (to the extent we have shared information for such purposes within the given period). This request is free and may be made once a year. You also have the right not to be discriminated against for exercising any of the rights listed above.

* Exercising Your California Privacy Rights

To request access to or deletion of your personal information, or to exercise any other rights under California law, please contact legal@baotris.com.

* Response Timing and Format

We aim to respond to a consumer request for access or deletion within 45 days of receiving that request. If we require more time, we will inform you of the reason and extension period in writing.

# INTERNATIONAL USERS

Baotris is located in the United States. By using the Services, you understand and consent to the processing of your personal information in the United States.

# HOW TO CONTACT US

Should you have any questions about our privacy practices or this Privacy Policy, please email us at legal@baotris.com